

## Subpart V Recordkeeping Findings

Clean Harbors Ohio

10/11/2019

Regulatory Basis 61.246	Recordkeeping Item	Inventory as of today	2016A	2015B	2015A	2014B	2014A	Status (Deficiency /Complete)	Comments
(b)(1)	For any leaks, weatherproof and readily visible identification, marked with equipment Identification number shall be attached to the leaking equipment		x	x	x	x	x	Complete	
(b)(2)	The identification on a valve may be removed after it has been monitored for 2 successive months as specified in § 61.242-7(c) and no leak has been detected during those 2 months.		x	x	x	x	x	Complete	
(b)(3)	The identification on equipment, except on a valve, may be removed after it has been repaired.		x	x	x	x	x	Complete	
(c)(1)	For each leak pump, compressor, valve, HL equipment, instrumentation systems, PRD in liquid, CVS & CD, agitators, connectors, the instrument and operator identification numbers and the equipment identification number shall be documented.		Missing	Missing	Missing	Missing	Missing	Deficient	Instrument not indicated on inspection form
(c)(2)	The date the leak was detected and the date of each attempt to repair leak		Missing	Missing	Missing	Missing	Missing	Deficient	The date leak was detected not documented
(c)(3)	Repair methods applied in each attempt to repair the leak.		Missing	Missing	Missing	Missing	Missing	Deficient	Only repairs with a work order are documented, that are not fixed same day. Repairs made same day by LDAR Technician is not documented.
(c)(4)	"Above 10,000" if the maximum instrument reading measured by the methods specified in § 61.245(a) after each repair attempt is equal to or greater than 10,000 ppm.		Missing	Missing	Missing	Missing	Missing	Deficient	PPM not documented
(c)(5)	"Repair delayed) and reason for delay if not repaired within 15 days of discovery of leak		Missing	Missing	Missing	Missing	Missing	Deficient	
(c)(6)	The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown.		Missing	Missing	Missing	Missing	Missing	Deficient	
(c)(7)	The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days.		Missing	Missing	Missing	Missing	Missing	Deficient	
(c)(8)	Dates of process unit shutdowns that occur while the equipment is unrepaired.		x	x	x	x	x	Complete	
(c)(9)	The date of successful repair of the leak.		Missing	Missing	Missing	Missing	Missing	Deficient	repair documentation with the date is recorded. If the repair is made in the field then the date is not documented, as there is no record keeping form for all leaks and repairs.
(d)	Maintain record of information for CVS and CD		x	x	x	x	x	Complete	
(d)(1)	Design schematics, specification of CD and P&IDs		x	x	x	x	x	Complete	
(d)(2)	Dates and descriptions of any changes in the design specifications		x	x	x	x	x	Complete	
(d)(3)	Description of parameter or parameters monitored to ensure CD are operated and maintained in conformance with their design and explanation of why that parameter was selected for monitoring		x	x	x	x	x	Complete	
	Records of operation of CVS and CD		x	x	x	x	x	Complete	
(d)(4)	Periods when the closed-vent systems and control devices required in §§ 61.242-2, 61.242-3, 61.242-4, 61.242-5 and 61.242-9 are not operated as designed, including periods when a flare pilot light does not have a flame.		x	x	x	x	x	Complete	

## Subpart V Recordkeeping Findings

Clean Harbors Ohio

10/11/2019

(d)(5)	Dates of startups and shutdowns of the closed-vent systems and control devices required in §§ 61.242-2, 61.242-3, 61.242-4, 61.242-5 and 61.242-9.		x	x	x	x	x	Complete	
(e)(1)	A list of identification numbers for equipment (except welded fittings) subject to the requirements of this subpart.	Missing						Deficient	Last inventory update was 2012, inventory not maintained
(e)(2)(i)	A list of identification numbers for equipment that the owner or operator elects to designate for no detectable emissions as indicated by an instrument reading of less than 500 ppm above background.	N/A						Not applicable	
(e)(2)(ii)	The designation of this equipment for no detectable emissions shall be signed by the owner or operator.	N/A						Not applicable	
(e)(3)	List of identification numbers for pressure relief devices	Missing						Deficient	PRD are not identified in a list. PVRV and conservation vents are, but they do not meet the definition
(e)(4)(i)	The dates of each compliance test required in §§ 61.242-2(e), 61.242-3(i), 61.242-4, 61.242-7(f), and 61.135(g).		x	x	x	x	x	Complete	
(e)(4)(ii)	The background level measured during each compliance test.		Missing	Missing	Missing	Missing	Missing	Deficient	only the date is documented for each compliance test
(e)(4)(iii)	The maximum instrument reading measured at the equipment during each compliance test.		Missing	Missing	Missing	Missing	Missing	Deficient	only the date is documented for each compliance test
(e)(5)	A list of identification numbers for equipment in vacuum service.	Missing						Deficient	Equipment that is in vacuum service is identified, but it is not exclusively in vacuum service, therefore it may be inspected at some point during each quarter and should not be labeled as exempt.
(f)	The following information pertaining to all valves subject to the requirements of § 61.242-7(g) and (h) and to all pumps subject to the requirements of § 61.242-2(g) shall be recorded in a log that is kept in a readily accessible location:	x						Complete	
(f)(1)	A list of identification numbers for valves and pumps that are designated as unsafe to monitor, an explanation for each valve or pump stating why the valve or pump is unsafe to monitor, and the plan for monitoring each valve or pump.	N/A						Not applicable	
(f)(2)	A list of identification numbers for valves that are designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the planned schedule for monitoring each valve.	Missing						Deficient	no explanation for each valve why it is difficult to monitor
(g)	The following information shall be recorded for valves complying with § 61.243-2:		N/A	N/A	N/A	N/A	N/A	Not applicable	
(g)(1)	A schedule of monitoring		N/A	N/A	N/A	N/A	N/A	Not applicable	
(g)(2)	the percent of valves found leaking during each monitoring period		N/A	N/A	N/A	N/A	N/A	Not applicable	
(h)	The following information shall be recorded in a log that is kept in a readily accessible location		Missing	Missing	Missing	Missing	Missing	Deficient	
(h)(1)	Design criterion required in §§ 61.242-2(d)(5), 61.242-3(e)(2), and 61.135(e)(4) and an explanation of the design criterion; and		Missing	Missing	Missing	Missing	Missing	Deficient	
(h)(2)	Any changes to this criterion and the reason for the changes		Missing	Missing	Missing	Missing	Missing	Deficient	
(h)(2)(i)	The following information shall be recorded in a log that is kept in a readily accessible location for use in determining exemptions as provided in the applicability section of this subpart and other specific subparts:		Missing	Missing	Missing	Missing	Missing	Deficient	

## Subpart V Recordkeeping Findings

Clean Harbors Ohio

10/11/2019

(i)(1)	An analysis demonstrating the design capacity of the process unit, and		Missing	Missing	Missing	Missing	Missing	Deficient	
(i)(2)	An analysis demonstrating that equipment is not in VHAP service.		Missing	Missing	Missing	Missing	Missing	Deficient	
(j)	Information and data used to demonstrate that a piece of equipment is not in VHAP serviceshall be recorded in a log that is kept in a readily accessible location.		Missing	Missing	Missing	Missing	Missing	Deficient	